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United States District Court  
Southern District of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

JUL 14 2020

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

FELIPE TUDON, JR  
JUAN ANGEL HERNANDEZ  
MARIO FIERRO  
BECKY LYNN VILLASENOR

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Criminal No. M-20-0483-S1

SEALED SUPERSEDING INDICTMENT

**THE GRAND JURY CHARGES:**

Count One

On or about May 7, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

FELIPE TUDON, JR  
JUAN ANGEL HERNANDEZ  
and  
MARIO FIERRO

knowingly made, and aided and abetted the making of, a false statement and representation with respect to information required to be kept in the records of Danny's Pawn & Sporting Goods, McAllen, Texas, a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, in connection with the acquisition of a FNH, Model Five Seven, 5.7x28mm caliber pistol, which statement was intended and likely to deceive Danny's Pawn & Sporting Goods, as to a fact material to the lawfulness of such sale the firearm described above, in that the defendants JUAN ANGEL HERNANDEZ and MARIO FIERRO aided and abetted FELIPE TUDON, JR to falsely represent on the ATF Form 4473 that defendant FELIPE TUDON, JR was

the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant FELIPE TUDON, JR was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

**Count Two**

On or about March 26, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**BECKY LYNN VILLASENOR  
and  
MARIO FIERRO**

knowingly made, and aided and abetted the making of, a false statement and representation with respect to information required to be kept in the records of Danny's Pawn & Sporting Goods, McAllen, Texas, a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, in connection with the acquisition of a Beretta, Model M9A3, 9mm pistol, which statement was intended and likely to deceive Danny's Pawn & Sporting Goods, as to a fact material to the lawfulness of such sale the firearm described above, in that the defendant MARIO FIERRO aided and abetted BECKY LYNN VILLASENOR to falsely represent on the ATF Form 4473 that defendant BECKY LYNN VILLASENOR was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant BECKY LYNN VILLASENOR was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

**Count Three**

On or about March 26, 2019, to July 13, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**MARIO FIERRO**

did fraudulently and knowingly export and send from the United States, or attempt to export and send from the United States, any merchandise, article, or object, to wit: a FNH, Model Five Seven, 5.7x28mm caliber pistol, and a Beretta, Model M9A3, 9mm pistol, contrary to Title 22, United States Code, Sections 2778(b)(2) and (c) and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, 127.1, and 127.3, a law and regulation of the United States.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**NOTICE OF FORFEITURE**  
**18 U.S.C. §§ 922(a)(6) and 924(a)(2)**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendants,

**FELIPE TUDON, JR  
JUAN ANGEL HERNANDEZ  
BECKY LYNN VILLASENOR  
and  
MARIO FIERRO**

that upon conviction of a violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), all firearms involved in said violation are subject to forfeiture, including but not limited to the following:

- (1) a FNH, Model Five Seven, 5.7x28mm caliber pistol, Serial Number: 386325675; and
- (2) a Beretta, Model M9A3, 9mm pistol, Serial Number: B000589Z.

**NOTICE OF FORFEITURE**  
**18 U.S.C. § 554**

Pursuant to 19 U.S.C. § 1595a(d) and 28 U.S.C. § 2461, the United States gives notice to defendant,

**MARIO FIERRO**

that upon conviction of a violation of 18 U.S.C. § 554, as charged in this Superseding Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to the following:

- (1) a FNH, Model Five Seven, 5.7x28mm caliber pistol, Serial Number: 386325675; and
- (2) a Beretta, Model M9A3, 9mm pistol, Serial Number: B000589Z.

A TRUE BILL

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FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY